

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MARCELO ALONZO-ALMARAZ

FILED

MAGISTRATE JUDGE BROWN

CRIMINAL COMPLAINT

MAR - 7 2008
March 7, 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

CASE NUMBER:

08CR 202

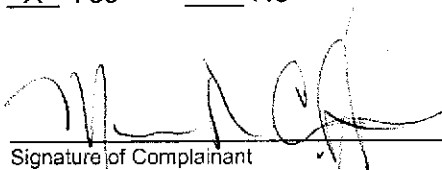
I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 5, 2007 ⁸ ^{G.S.B.} ^{MD} in Will county, in the Northern District of Illinois defendant(s) did

knowingly and in reckless disregard of the fact that certain aliens had come to, entered or remained in the United States in violation of law, did transport, or move or attempt to transport or move such aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii).

I further state that I am a(n) Special Agent Official Title and that this complaint is based on the following facts:

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

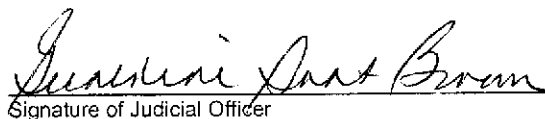


Signature of Complainant

Sworn to before me and subscribed in my presence,

March 7, 2008 at Chicago, Illinois
Date City and State

Geraldine Soat Brown, U.S. Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

AFFIDAVIT

I, Maribel Covarrubias, being duly sworn, depose and state as follows:

1. I am a Special Agent with the United States Immigration and Customs Enforcement ("ICE") and have been so employed for approximately five years. I was previously employed with the Immigration and Naturalization Service, which is now known as the Immigration and Customs Enforcement. I am a member of a criminal investigative unit, which specializes in the investigation of the human trafficking, and violations of Title 8 of the United States Code.

2. This affidavit is in support of a complaint charging MARCELO ALONZO-ALMARAZ with knowingly transporting illegal aliens within the United States in violation of Title 8 U.S.C. Section 1324(a)(1)(A)(ii). I make this affidavit from personal knowledge, my review of INS/ICE records, information gathered during the course of my investigation, and information provided by other law enforcement personnel. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. On March 5, 2008, ^{CSB} at approximately 10:30a.m., at Interstate 55 northbound at mile marker 235 north in Will County, Illinois, Officer Doug Savarino with the Braidwood, Illinois Police Department, stopped a 2000 Dodge Van bearing Arizona license plate, JK 2407, for improper lane usage.

4. According to Officer Savarino, he found inside the van a driver, later determined to be MARCELO ALONZO-ALMARAZ, along with twelve other passengers, all of whom were later determined to be undocumented foreign nationals.

5. According to Officer Savarino, the van's occupants did not speak English and did not possess any identification produced in the United States. Officer Savarino then notified Group Supervisor William Orr of ICE that he had pulled over a group of individuals whom he suspected were undocumented foreign nationals that were being illegally transported within the United States based on their inability to speak English, their lack of identification, and his experience from previous stops of similar individuals.


6. Officer Savarino then transported the van's occupants to the Braidwood Police Department to meet with agents from ICE's Human Trafficking Unit. Upon questioning the van's occupants in Spanish, the ICE agents determined that they were in fact undocumented foreign nationals present illegally in the United States. ICE then took the driver and passengers into custody and placed them in administrative removal proceedings.

7. ICE agents identified the driver of the van as MARCELO ALONZO-ALMARAZ. The agents read ALONZO-ALMARAZ his *Miranda* rights in Spanish. ALONZO-ALMARAZ indicated that he understood his rights and agreed to be interviewed by ICE agents. ALONZO-ALMARAZ told ICE agents that on March 2, 2008, in Phoenix, Arizona, he was given the Dodge van by an individual named "Juan" (last name unknown) that contained 12 passengers. ALONZO-ALMARAZ stated that Juan agreed to pay him \$1000.00 USD to drive the passengers to various states throughout the United States, including Illinois, New York, Virginia, North Carolina, Tennessee, and Wisconsin. ALONZO-ALMARAZ further stated to the ICE agents that his first destination for dropping off the van's passengers was Chicago, Illinois. ALONZO-ALMARAZ admitted that he knew the passengers were illegal aliens based on their unclean appearance from crossing the border into the United States.

7. Based on the above information I believe that there exists probable cause to believe

that MARCELO ALONZO-ALMARAZ knowingly transported illegal aliens within the United States in violation of Title 8 United States Code, Section 1324 (a)(1)(A)(ii).

FURTHER AFFIANT SAYETH NOT.



Maribel R. Covarrubias
Senior Special Agent
U.S. Immigration and Customs Enforcement

SUBSCRIBED AND SWORN TO BEFORE ME
this 7th day of March, 2007.



GERALDINE SOAT BROWN
UNITED STATES MAGISTRATE JUDGE